

COOPER UNION TAX OPENS BIG QUESTION

**Inquiry on Chrysler Building
Exemption Affects Other
Valuable Holdings.**

ALBANY ACTION FORECAST

**Official Says Union Is Free From
Levy on Any Property Under 1859
Law Which Has Been Upheld.**

Any effort by city authority to tax the sixty-eight-story Chrysler Building and the exempted land upon which it is being erected, owned by Cooper Union, probably would affect the status of other valuable properties in New York which are free of taxation by old special laws similar to that under which Cooper Union operates, it was learned yesterday at the offices of the Department of Taxes and Assessments. It was said, however, that the fact that Henry M. Goldfogle, president of the Board of Taxes and Assessments, has ordered an inquiry into the history of Cooper Union property on the east side of Lexington Avenue, between Forty-second and Forty-third Streets, where the Chrysler skyscraper is going up, as a "basis for possible future action," does not involve the hundreds of millions of dollars worth of exempted property coming under the regular tax law. The law removes realty levies from land and buildings used for governmental, public, religious, charitable and educational purposes.

Differentiation of Holdings.

The status of property belonging to Trinity Episcopal Church, Sailors' Snug Harbor, Columbia University and other such institutions would not be changed, it was made clear, nor would that part of the property of Cooper Union itself which is used for educational purposes be affected. The tax law covers these holdings, and those not utilized for the purposes of the exempted organizations are taxed. Trinity Church pays taxes on much of its property used for offices, banks and other business, it was said, and the extensive midtown holdings of Columbia University leased to John D. Rockefeller Jr. for an opera development are subject to taxation.

Sailors' Snug Harbor gets immunity on 200 acres of land and numerous buildings on Staten Island occupied in accordance with the will of the founder, Robert Richard Randall, as a retreat for "aged, decrepit and worn-out sailors," but pays taxes on several blocks of leased land, "never to be sold," in the territory between Sixth and Tenth Streets, Fourth and Fifth Avenues, Manhattan, a twenty-acre farm when Randall deeded it to Sailors' Snug Harbor in 1801.

Under Chapter 703 of the Laws of 1904 the United Engineering Society, Inc., received tax exemption under a classification in many ways similar to that of Cooper Union, its purposes being set down in the tax books as "library and educational." Cooper Union's purposes are listed as "moral and mental improvement."

The United Engineering Society maintains a sixteen-story building at 25-33 West Thirty-ninth Street, which consists of a library, an auditorium and offices, the latter rented. In the city tax books of 1928 this property is marked exempt.

The law governing the society gives immunity from taxes to any building "used in whole or in part" for the purposes of the organization, a study of the books showed.

Legislative Move Possible.

Since the law of 1859 giving Cooper Union exemption "in perpetuity" has been tested in court and upheld as it stands even with regard to properties leased for other than educational use, it is predicted that legislative rather than court action would be resorted to by the city in any move to place the Chrysler Building on the tax lists. R. J. Delehanty, chief deputy of real estate of the Board of Taxes and Assessments, said that "it obviously was not the intention of the laws of 1859 or of any early special legislation to allow general exemptions such as now exist in several cases."